

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

## Chapter 11

LEHMAN BROTHERS HOLDINGS INC., *et al.*,

Case No. 08-13555 (JMP)

Debtors.

(Jointly Administered)

LEHMAN BROTHERS HOLDINGS INC. and  
LEHMAN BROTHERS SPECIAL  
FINANCING, INC. and OFFICIAL COMMITTEE  
OF UNSECURED CREDITORS OF LEHMAN  
BROTHERS HOLDINGS INC., *et al.*

Adv. Proc. No. 10-03228-jmp

Plaintiffs and

Intervenor,

-against-

NOMURA INTERNATIONAL PLC,

Defendant.

LEHMAN BROTHERS HOLDINGS INC. and  
LEHMAN BROTHERS SPECIAL  
FINANCING, INC. and OFFICIAL COMMITTEE  
OF UNSECURED CREDITORS OF LEHMAN  
BROTHERS HOLDINGS INC., *et al.*

Plaintiffs and

Intervenor,

-against-

NOMURA SECURITIES CO., LTD.

Defendant.

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**STIPULATED SCHEDULING ORDER FOR CONSOLIDATED ACTIONS**

This Civil Case Management Plan submitted in accordance with Fed. R. Bankr. P. 7026 and Fed. R. Civ. P. 26(f), is adopted as the Scheduling Order of this Court for these consolidated actions. It supersedes the So Ordered Stipulated Scheduling Order between Debtors and Nomura International plc, Nomura Securities Co., Ltd. and Nomura Global Financial Products, Inc. [Docket No. 12270].

1. Amended pleadings may not be filed except with leave of the Court. Any motion to amend shall be filed within 30 days after entry of this order.

2. All fact discovery shall be completed by May 18, 2011.

3. The parties are to conduct discovery in accordance with the Federal Rules of Bankruptcy Procedure, the Federal Rules of Civil Procedure (as incorporated therein), and the Local Rules of this Court. In accordance with Federal Rules of Bankruptcy Procedure 9014 and 7026-7037, Federal Rules of Civil Procedure 26-37 shall apply in their entirety to these proceedings. The following interim deadlines may be extended by the written consent of the parties without application to the Court, provided all fact discovery is completed by the date set forth in paragraph 2 above:

A. Requests for production of documents may be served no later than January 14, 2011.

B. Objections to requests for the production of documents to be served within 20 days of the service of each request or set of requests for the production of documents.

C. Interrogatories pursuant to Local Bankruptcy Rule 7033-1(a) and 7033-1(b) may be served no later than January 14, 2011.

D. Interrogatories pursuant to Local Bankruptcy Rule 7033-1(c) may be served no earlier than March 28, 2011 and no later than May 18, 2011.

E. Requests for admissions may be served no earlier than March 28, 2011  
and no later than May 18, 2011.

F. Document production to be substantially completed by February 16, 2011.

G. Depositions of fact witnesses to be completed by May 18, 2011.

4. Expert reports will be exchanged on June 17, 2011. The parties will exchange  
any rebuttal expert reports on July 18, 2011. Expert discovery to be completed 21 days after the  
receipt of the last expert report.

5. Dispositive motions to be filed no later than August 17, 2011.

6. A pretrial hearing shall be held at a date to be determined.

7. The trial(s) shall be held at a date to be determined by the Court.

Dated: November 18, 2010  
New York, New York

/s/ Sarah E. Lieber

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*Attorneys for the Debtors and  
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Dated: November 18, 2010  
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Dated: November 18, 2010  
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*Attorneys for the Official Committee of  
Unsecured Creditors*

**SO ORDERED:**

Dated: New York, New York  
November 30, 2010

s/ James M. Peck  
HONORABLE JAMES M. PECK  
UNITED STATES BANKRUPTCY JUDGE